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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

R. CATHY REARDON
On behalf of herself and all
similarly situated individuals,

Plaintiffs,

v.

NO. 2:08cv1730GLL

CLOSETMAID CORPORATION

Hon. Judge Gary Lancaster

Defendant.

DECLARATION OF CHRISTOPHER COLT NORTH

I, Christopher Colt North, declare:

1. My name is Christopher Colt North. I have personal knowledge of the facts stated herein, and they are all true and correct.
2. I am one of the attorneys representing Plaintiffs in the above styled litigation. I am the President of The Consumer & Employee Rights Law Firm, P.C. located at 751-A Thimble Shoals Boulevard, Newport News, VA 23606.
3. Commencing in 1977 I have been, and currently am, a member in good standing of the Bar of the highest court of the State of Virginia where I regularly practice law. I have been admitted to practice before, and am currently a member in good standing of the Bars of the following courts:

Court:	Date Admitted:
United States Supreme Court	1980
United States Court of Appeals for the Fourth Circuit	1977

United States District Court for the Eastern District of Virginia	1977
United States District Court for the Western District of Virginia	2002

I have been admitted pro hac vice in this Court, as well as the following additional courts:

Court:	Date Admitted:
Western District of Pennsylvania	3/18/09
Northern District of Illinois	7/8/09
Middle District of Florida	7/21/09
Eastern District of Wisconsin	8/6/09
Eastern District of North Carolina	9/10/09

4. Commencing in approximately 1990 I began emphasizing employment law. In 2003 I began associating with Leonard A. Bennett and Consumer Litigation Associates, P.C. on a variety of consumer claims by employees and prospective employees.

5. My class action experience prior to 2007 was with FLSA opt-in class actions. I handled about a dozen of them between 1997 and 2007, including *Bingham v. Newport News Shipyard* which had a potential class of 200 engineers and 15 named Plaintiffs who actually opted in, and *Bernard v. Household Finance* which had 15 Plaintiffs.

6. In 2007 Mr. Bennett's firm and my firm filed class actions against Telespectrum, an employer, and the LexisNexis credit reporting agency that provided consumer reports to Telespectrum. The Telespectrum case settled on a confidential individual basis. Two classes were certified in the LexisNexis case, one with 1,777 individuals who received \$1,000.00 each (§1681i), and a second with approximately 250,000 individuals who received approximately \$55.00 each (§1681k). The total settlement exceeded \$20 million, including fees and costs.

7. In 2008 Mr. Bennett's firm and my firm filed a class action against Walmart and Target under §1681b(b)(3)(A) on behalf of Stephan Beverly and Bruce Smith, and a separate class action against ChoicePoint (under §1681k), the credit reporting agency that provided the consumer reports to those retailers. The cases were combined and settled for approximately \$7 million including attorney's fees and costs. There were approximately 120,000 people in the Walmart class (\$75.00 each) and approximately 80,000 in the Target class (\$25.00 each).

8. Over the past two years I have filed, along with local counsel if filed outside Virginia, a number of class actions against employers under the FCRA, including the following:

Black, et al v. Winn-Dixie Stores, Inc. Jacksonville, FL. The §1681(b)(3)(A) class contains approximately 800 members, and the Defendant has offered to set up a fund in the amount of \$333,000.00. Negotiations continue.

Smith v. Staley, Inc. Knoxville, TN. §1681(b)(3)(A) claim settled on a class basis. 56 class members received \$1,075.00 each, plus \$41,000.00 attorney's fees and costs.

Smith v. Talecris Biotherapeutics, Inc. Durham, NC. 72 §1681b(b)(3)(A) class members received \$1,000.00 each, plus \$55,000.00 attorney's fees and costs.

Daily, et al v. NCO Financial Systems, Inc., et al. Richmond, VA. The case involves two subclasses, a disclosure subclass under §1681(b)(2)(A) and a pre-adverse action notice subclass under §1681(b)(3)(A). Defendant has agreed to pay \$743,850.00 for the disclosure subclass members, \$522,000.00 for the pre-adverse action notice subclass members, and \$480,000.00 for class counsel fees and costs (27.5% of the common fund). The disclosure subclass contains approximately 38,000 members. Settlement of the disclosure subclass anticipates claims made by 15% of the eligible subclass members (\$135.00 each). The pre-adverse action notice subclass contains approximately 3,000 members (\$175.00 each).

Anderson, et al v. Signix, Inc. and National Notary Association. Richmond, VA. Approximately 16,000 1681b(b)(2)(A) class members received \$52.00 each in free annual dues or cash, and

450 1681b(b)(3)(A) class members received \$250.00 each. The total settlement was \$944,500.00, including attorney's fees, costs and incentive awards of approximately \$236,125.00.

9. In January 2010 Mr. Bennett and I filed a class action with 15 class representatives against USIS, now known as HireRight. This case is pending in Richmond, VA and should include hundreds of thousands of class members. The case is stayed pending mediation. The claims involve 15 UCS §1681k; 15 USC §1681g; 15 USC §1681i(a); and, 15 USC §1681e(b).

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 9th day of September, 2010.

/S/
Christopher Colt North

Christopher Colt North
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